

# EXHIBIT “C”

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August 27, 2024

**Via ECF**New York County Supreme Court  
111 Centre Street, Room 1021  
New York, New York 10013  
Attn: Hon. Paul A. Goetz***Re: Daniel Szalkiewicz & Associates, P.C. et ano v. Liu (Action 1)***  
***Supreme Court, New York County***  
***Index No. 150713/2024******Mancilla & Fantone, LLP et al v. Vivian Liu (Action 2)***  
***Supreme Court, New York County***  
***Index No. 450521/2024***

Dear Judge Goetz,

I write to alert the Court as to a disturbing incident that occurred this morning. Today, August 27, 2024, both my partner, Cali, and I received e-mails from forlolipornlovers@protonmail.com. The first, which was delivered at 9:44 a.m., indicates “Vivian Liu has gifted you with a Loliporn subscription. We are the premier location for child pornography on the dark web...” The e-mail contains 12 attachments: images and videos which depict very young children engaged in sexual acts. Later, at 9:52 a.m., both Cali and I received another e-mail from the same account which contained an additional video file and provided “Just one more video for today to make you cum.”

Pursuant to 18 U.S. Code § 2252(c), Cali and I have filed police reports with the New York City Police Department, contacted the Special Agent at the Federal Bureau of Investigation handling the previous threats concerning Ms. Liu, and alerted the National Center for Missing & Exploited Children (NCMEC). The e-mails effectively shut down our office for several hours.

This is the third incident where either Ms. Liu herself, someone reporting Ms. Liu, or someone purportedly acting on Ms. Liu’s behalf, has contacted our office. Despite being represented by counsel, on Saturday, May 18, 2024, at 11:41 P.M., Ms. Liu emailed Cali and me documents relating to the case. On May 19, 2024, at 8:01 A.M. we alerted Mr. Bryant as to Ms. Liu’s conduct and an hour later we were informed that it was “inadvertent production.” On June 13, 2024 and June 14, 2024, I received the death threats referenced in the most recent pleadings (DE 122 and 124). Then, this morning we received the two e-mails containing CSAM. It can be no coincidence that on August 23, 2024, *in a sealed document*, I argued that Ms. Liu has violated Civil Rights Law 79-n because she targeted only me and not Cali, and now, for the first time, Cali is receiving harassing messages as well.

It is respectfully requested that this court either (1) *sua sponte* issue an order directing Ms. Liu and her agents (with the exception of counsel) to have no further contact with me or my firm

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or (2) lift the stay under CPLR 3211(g)(3) so an order to show cause can be filed seeking an injunction to prevent Ms. Liu's harassing and illegal conduct.

Thank you.

Respectfully submitted,

*/s/ Daniel S. Szalkiewicz*

By: Daniel S. Szalkiewicz, Esq.

cc: All counsel via NYSCEF